



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Jack Hanson, Treasurer
Pioneer Political Action Committee
412 First Street, SE, Suite 100
Washington, DC 20003

JUL 3 2001

Identification Number: C00325357

Reference: Year End Report (11/28/00-12/31/00)

Dear Mr. Hanson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-On Schedules H2, H3 and H4, it appears you have revised the ratio for several fundraising events and for several activities you have categorized as "exempt", and have indicated that the actual non-federal share of expenses was greater than originally estimated. Furthermore, your previous reports have been amended to disclose most of the activities previously categorized as "exempt" to be "administrative".

Please be advised that any adjustment to a ratio for administrative/generic voter drive expenses should be reflected on Schedule H1, while any adjustments for fundraising event expenses should be reflected on Schedule H2. In addition, all adjustments should reflect the federal and non-federal shares of the actual receipts. Furthermore, if an adjustment indicates that the federal account has paid more than its share of allocable expenses, a ~~committee may transfer funds from the non-federal account to make up for~~ ~~the excessive non-federal payment(s).~~ Such transfers, however, may only be made within 60 days after the event. 11 CFR §106.6(d)(2) Transfers from the non-federal account for this type of adjustment should ONLY be itemized on Schedule H3 and included in the total for Line 18 on the Detailed Summary Page. Please amend your report to clarify all ratio adjustments accordingly.

-Please amend Schedule H1 to include the revised ratio and amount of